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9 **UNITED STATES DISTRICT COURT**  
10  
11 **DISTRICT OF NEVADA**

12 JOSEPH O'SHAUGHNESSY, et al.

13 Case No.: 2:22-cv-01039-WQH-EJY

14 Plaintiffs,

15 v.  
16 UNITED STATES OF AMERICA,

17 Defendants.

18 TODD C. ENGEL,

19 Case No.: 2:22-cv-01040-WQH-EJY

20 Plaintiff,

21 v.  
22 UNITED STATES OF AMERICA,

23 Defendants.

24 **STIPULATION TO EXTEND  
DEADLINE FOR FILING THE  
PARTIES' PROPOSED DISCOVERY  
PLAN**

25 (First Request)

26 Plaintiffs Joseph O'Shaughnessy, Jason D. Woods, Mel Bundy and Dave Bundy  
27 (hereinafter the "Tier 2 Plaintiffs") and the Bundy Family Members (i.e., Marylynn Bundy,  
Briana Bundy, Brett Roy Bundy, Maysa Lynn Bundy, Dally Anne Bundy, Bronco Cliven Bundy,  
Payton Alma Bundy, Piper Bodel Bundy, Montana Bundy, Bentile Bundy, Presly Bundy, Kymber  
Bundy and Adahlen Bundy) hereinafter collectively "the O'Shaughnessy Plaintiffs," Todd Engel  
("Engel" - the Related Action Plaintiff) and the United States of America ("USA"), by and

1 through their respective counsel of record hereby move the Court to extend the deadlines for the  
2 parties to file a Joint Discovery Plan by eight (8) days to February 9, 2024.

3 Counsel for the United States, Neil Singh, lead counsel for defense in the Engel case,  
4 suffered a death in his family and is out all this week. The parties have been conferring in good  
5 faith regarding the production of a joint discovery plan and a protective order, among other  
6 issues, to address with the Court at a Case Management Conference to be scheduled. The parties  
7 ask for the Court's permission to submit their discovery plan and proposed scheduling order on  
8 or before February 9, 2024.

9 RESPECTFULLY SUBMITTED this 30<sup>th</sup> day of January, 2024.

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MERRICK GARLAND  
United States Attorney General

12 By: /s/ Craig A. Marquiz, Esq.  
13 Craig A. Marquiz, Esq.  
14 3088 Via Flaminia Court  
15 Henderson, NV 89052  
16 Counsel for Plaintiffs

By: /s/ Brock Heathcotte, Esq.  
Brock Heathcotte, Esq.  
Neil Singh, Esq.  
Special Assistant US Attorneys,  
Acting Under Authority Conferred by  
28 U.S.C. § 515  
Counsel for Defendant United States

17  
18 **ORDER**  
19

20 Pursuant to Stipulation and good cause appearing,

21 IT IS ORDERED that the parties shall have through February 9, 2024 to submit their  
22 Discovery Plan & Scheduling Order.

23 Dated this \_\_\_\_ day of January, 2024.

24 United States District Court Judge  
25  
26  
27  
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